



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

NOTES OF CASES.

RIPARIAN RIGHTS BETWEEN HIGH AND LOW WATER MARK.—The owner of land bordering on the ocean is held, in *San Francisco Savings Union v. R. G. R. Petroleum & M. Co.* (Cal.), 66 L. R. A. 242, to be entitled to maintain an action to enjoin a trespasser from placing structures between high and low water mark, which will interfere with his right of access to and from the water.

In Virginia, the riparian owner has the fee simple title to the land bounded by a tidal stream, so far as low water mark. Sec. 1359, Va. Code 1904. As to rights of riparian owners, see *Taylor v. Commonwealth*, 10 Va. Law Reg. 219, and note, p. 234; Farnham on Waters, 278, 280, 285.

LIBEL—NEWSPAPER PUBLICATIONS—MATTER ACTIONABLE PER SE.—A newspaper publication stating that a man is a eunuch is held in *Erkert v. Van Pelt* (Kan.), 66 L. R. A. 266, to be actionable *per se*.

SEPARATION OF JURY—CF. SEC. 4025, VA. CODE 1904.—One convicted of crime is held in *People v. Adams* (Cal.), 66 L. R. A. 247, to be entitled to a new trial, where the sheriff, after the case had been submitted to the jury, divided them into three groups and locked them in separate rooms on different floors of the hotel for the night, notwithstanding the court had directed him to keep them together, in accordance with the provisions of the statute, unless it is affirmatively shown that no prejudice resulted therefrom.

See sec. 4025, Va. Code 1904, and note, where the Virginia authorities are collated; also 10 Va. Law Reg. 170.

RELIGIOUS EXERCISES IN PUBLIC SCHOOLS—WHAT IS SECTARIAN DOCTRINE.—A public school teacher who repeats the Lord's Prayer and the Twenty-Third Psalm as a morning exercise, without comment or remark, in which none of the pupils are required to participate, is held in *Billard v. Topeka Board of Education* (Kan.), 66 L. R. A. 166, not to be conducting a form of religious worship, or teaching sectarian or religious doctrine.

SIDEWALKS—USE BY MERCHANTS FOR BUSINESS PURPOSES—DUTY TO USE REASONABLE CARE TO KEEP SAFE.—Merchants who use a portion of the sidewalk adjoining their place of business for receiving and shipping goods to such an extent that travelers are limited to the use of a narrow passageway during most of the business hours of the day are held, in *Garibaldi v. O'Connor* (Ill.), 66 L. R. A. 73, to be bound to use reasonable care to see that such passageway is kept safe, and are not to be regarded as having done so if they have permitted it to be strewn with straw and loose bananas.

CRIMINAL LAW—MURDER—INCITING TO SUICIDE—Proof of persuading and procuring a person to take poison which results in death is held, in *Burnett v. People* (Ill.), 66 L. R. A. 304, to warrant a conviction of murder. The other cases on inciting or abetting suicide are collated in a note to this case.